

1 The Honorable Robert S. Lasnik
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IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

10 UNITED STATES OF AMERICA,)
11 Plaintiff,) Case No. 2:18-cv-01067-RSL
12 v.)
13 JAMES J. JACKSON III;) **[PROPOSED] ORDER STAYING**
14 KING COUNTY; STATE OF WASHINGTON) **EXECUTION OF ORDER OF**
DEPARTMENT OF REVENUE; and) **FORECLOSURE AND JUDICIAL**
JPMORGAN CHASE BANK, N.A.,) **SALE**
15 Defendants.)
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17 Plaintiff, the United States, and Defendant James J. Jackson III, entered into an
18 agreement to stay the execution of the Court's Order of Foreclosure and Judicial Sale in order to
19 provide James J. Jackson III with an opportunity to refinance the Subject Property, provided that
20 the refinancing is in accordance with the terms of the settlement agreement entered between the
21 United States and James J. Jackson III, including that the refinancing fully pays Mr. Jackson's
22 federal tax liabilities described in paragraphs 1-2 of the Stipulated Motion for Entry of Judgment,
23 Order of Foreclosure and Judicial Sale, and Order Staying Execution of Order of Foreclosure and
24 Judicial Sale ("Stipulated Motion") (Dkt. # 33). Pursuant to the stipulation between the parties

1 set forth in the Stipulated Motion, IT IS HEREBY ORDERED:

2 1. The Order of Foreclosure and Judicial Sale entered by this Court is stayed until
3 July 1, 2020, at which point, this stay will automatically expire.

4 2. If James J. Jackson III successfully refinances the Subject Property in accordance
5 with the terms of the settlement agreement entered between the United States and James J.
6 Jackson III, including that the refinancing fully pays Mr. Jackson's federal tax liabilities
7 described in paragraphs 1-2 of the Stipulated Motion, or otherwise satisfies the federal tax
8 liabilities at issue in this action, prior to July 1, 2020, then the Court shall promptly be notified.

9 3. At all times until the ultimate disposition of the Subject Property, and consistent
10 with the Order of Foreclosure and Judicial Sale, James J. Jackson III shall take all reasonable
11 steps necessary to preserve the Subject Property, including all buildings, improvements, fixtures,
12 and appurtenances to the Subject Property, in its current condition, including, without limitation,
13 maintaining a fire and casualty insurance policy. He shall neither commit waste against the
14 Subject Property nor permit anyone else to do so.

15 4. At all times until the ultimate disposition of the Subject Property, and consistent
16 with the Order Foreclosure and Judicial Sale, James J. Jackson III shall neither do anything that
17 tends to reduce the value or marketability of the Subject Property nor cause or permit anyone
18 else to do so. He shall not record any instruments, publish any notice, or take any other action
19 (such as running newspaper advertisements or posting signs) that may directly or indirectly tend
20 to adversely affect the value of the Subject Property or that may tend to deter or discourage
21 potential bidders from participating in a public auction, should one ultimately become necessary,
22 nor shall he cause or permit anyone else to do so.

23 5. Until the expiration of this stay of execution of the Order of Foreclosure and
24 Judicial Sale on July 1, 2020, and within any extension of time granted by the United States to

1 facilitate a successful refinance of the Subject Property, James J. Jackson III shall use good-faith
2 efforts to refinance the Subject Property in accordance with the terms of the settlement
3 agreement entered between the United States and James J. Jackson III, or otherwise satisfy the
4 federal tax liabilities at issue in this action.

5 **IT IS SO ORDERED.**

6 DATED this 3rd day of March, 2020,
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9 UNITED STATES DISTRICT JUDGE

10 *Presented By:*

11 RICHARD E. ZUCKERMAN
12 Principal Deputy Assistant Attorney General

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